

Exhibit 8

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO
RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO,
et al.,

Debtors.¹

PROMESA

Title III

No. 17 BK 3283-LTS

(Jointly Administered)

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO
RICO,

as representative of

THE EMPLOYEES RETIREMENT SYSTEM
OF THE GOVERNMENT OF THE
COMMONWEALTH OF PUERTO RICO,

Debtor.

PROMESA

Title III

No. 17 BK 3566-LTS

Re: Adv. Pro. Nos. 19-00356, 19-00357,
19-00358, 19-00359, 19-00361, 19-
00366 and 19-00367

**FIRST SET OF REQUESTS FOR ADMISSION OF THE COMMITTEES AND
GOVERNMENT PARTIES TO THE ERS BONDHOLDER GROUPS**

¹ The Debtors in these jointly-administered PROMESA title III cases (these “**Title III Cases**”), along with each Debtor’s respective title III case number listed as a bankruptcy case number due to software limitations and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are: (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (Bankruptcy Case No. 17 BK 3284) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric and Power Authority (Bankruptcy Case No. 17 BK 4780) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA”) (Bankruptcy Case No. 19-BK-5233-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

Pursuant to Rules 7026, 7036 and 9014 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), made applicable to this contested matter pursuant to Section 310 of the *Puerto Rico Oversight, Management, and Economic Stability Act*, codified at 48 U.S.C. §§ 2101-2241 (“PROMESA”), and the Court’s October 24, 2019 *Order Granting Urgent Joint Motion to Modify Order Regarding Stay and Mandatory Mediation With Respect To Certain Issues Raised in Certain Contested Matters and Adversary Proceedings Related to the Bonds Issued by the Employees Retirement System of the Government of the Commonwealth of Puerto Rico*, the Official Committee of Unsecured Creditors (the “**Creditors’ Committee**”), the Official Committee of Retired Employees of the Commonwealth of Puerto Rico (the “**Retiree Committee**” and, together with the Creditors’ Committee, the “**Committees**”), the Financial Oversight and Management Board for Puerto Rico (the “**FOMB**”), the Special Claims Committee of the Financial Oversight and Management Board for Puerto Rico (the “**SCC**”), the Puerto Rico Fiscal Agency and Financial Advisory Authority (“**AAFAF**” and, together with the FOMB and the SCC, the “**Government Parties**”), request that certain groups of ERS bondholders represented by Jones Day and White & Case LLP (collectively, the “**ERS Bondholder Groups**”)² respond to the following Requests for Admission. The ERS Bondholder

² The ERS Bondholder Groups are: Andalusian Global Designated Activity Company, Glendon Opportunities Fund, L.P., Mason Capital Master Fund LP, Oaktree-Forrest Multi-Strategy, LLC (Series B), Oaktree Opportunities Fund IX, L.P., Oaktree Opportunities Fund IX (Parallel 2), L.P., Oaktree Value Opportunities Fund, L.P., Ocher Rose, L.L.C., Puerto Rico AAA Portfolio Bond Fund, Inc., Puerto Rico AAA Portfolio Bond Fund II, Inc., Puerto Rico AAA Portfolio Target Maturity Fund, Inc., Puerto Rico Fixed Income Fund, Inc., Puerto Rico Fixed Income Fund II, Inc., Puerto Rico Fixed Income Fund III, Inc., Puerto Rico Fixed Income Fund IV, Inc., Puerto Rico Fixed Income Fund V, Inc., Puerto Rico GNMA & U.S. Government Target Maturity Fund, Inc., Puerto Rico Investors Bond Fund I, Puerto Rico Investors Tax-Free Fund, Inc., Puerto Rico Investors Tax-Free Fund II, Inc., Puerto Rico Investors Tax-Free Fund III, Inc., Puerto Rico Investors Tax-Free Fund IV, Inc., Puerto Rico Investors Tax-Free Fund V, Inc., Puerto Rico Investors Tax-Free Fund VI, Inc., Puerto Rico Mortgage-Backed &

Groups are directed to serve their verified answers in accordance with the above-cited rules and in accordance with the definitions and instructions below on counsel for each of the Committees and Government Parties on or before December 3, 2019.

DEFINITIONS

1. **“2008 ERS Bond Issuance”** means the issuance or issuances of ERS Bonds under the ERS Bond Resolution.

2. **“Additional Uniform Contributions”** or **“AUC”** has the same meaning ascribed to it in the ERS Enabling Act.

3. **“Commonwealth”** is defined as the Commonwealth of Puerto Rico.

4. **“Employee Loans”** means personal and home mortgage loans to employee participants and retirees consistent with 3 L.P.R.A. § 779.

5. **“Employee Loan Payments”** means funds received by ERS as, from, or in connection with the repayment (in whole or in part) of Employee Loans.

6. **“ERS”** means the Employees Retirement System of the Government of the Commonwealth of Puerto Rico.

7. **“ERS Bond”** means any bond issued by ERS under the ERS Bond Resolution (including any indirect or beneficial interest therein).

8. **“ERS Bond Resolution”** means that certain Pension Funding Bond Resolution adopted as of January 24, 2008 by the Board of Trustees of ERS, as amended and supplemented.

9. **“ERS Bondholder”** means any holder or owner of a direct, indirect, or beneficial interest in an ERS Bond (including any indirect or beneficial interest therein).

10. **“ERS Enabling Act”** means Puerto Rico Act No. 447-1951 (codified, as amended, at 3 L.P.R.A. §§ 761-788).

U.S. Government Securities Fund, Inc., SV Credit, L.P., Tax-Free Puerto Rico Fund, Inc., Tax-Free Puerto Rico Fund II, Inc., Tax-Free Puerto Rico Target Maturity Fund, Inc., UBS IRA Select Growth & Income Puerto Rico Fund, Crown Managed Accounts for and on behalf of Crown/PW SP, LMA SPC for and on behalf of Map 98 Segregated Portfolio, Oceana Master Fund Ltd., Pentwater Merger Arbitrage Master Fund Ltd., and PWCM Master Fund Ltd.

11. “**Fiscal Agent**” means The Bank of New York Mellon, as Fiscal Agent under the ERS Bond Resolution.

12. “**Relating to**” means concerning, pertaining to, referring to, deriving from, resulting from, or otherwise having any factual or logical connection with a given person, thing, or matter.

13. The terms “**You**” and “**Your**” refer to each of the responding ERS Bondholder Groups, each of their respective constituent ERS Bondholders, and all persons acting on behalf of, for the benefit of, at the direction of, in exchange for compensation from, or under the control or authority of, any of the foregoing.

INSTRUCTIONS

1. Each of the matters of fact and the genuineness of each document of which admission is requested herein is admitted unless, on or before December 3, 2019, You serve on counsel for each of the Committees and Government Parties either: (1) a sworn statement denying specifically the matters of which admission is requested or setting forth in detail the reasons why You cannot truthfully admit or deny those matters, or (2) written objections on the ground that some or all of the requested admissions are privileged or irrelevant or that the request is otherwise improper in whole or in part. A denial shall fairly meet the substance of the requested admission. If good faith requires that You deny only a part, or requires qualification, of a matter of which an admission is requested, You shall specify so much of the requested admission as is true and deny only the remainder.

2. Unless otherwise specified, all terms used herein shall be interpreted as they are used in the Federal Rules of Civil Procedure, as made applicable by the Federal Rules of Bankruptcy Procedure.

3. All terms defined above shall have the meanings set forth above, whether capitalized in these Requests for Admission or not.

4. “All”, “any”, and “each” shall be construed as all, any, and/or each as necessary to bring within the scope of the discovery request all responses that otherwise could be construed to be outside of its scope.

5. “And” as well as “or” shall be construed either disjunctively or conjunctively as necessary to bring within the scope of this request all responses that might otherwise be construed to be outside of its scope.

6. Whenever appropriate, the singular and plural forms of words shall be interpreted interchangeably so as to bring within the scope of these requests any matter which might otherwise be construed to be outside their scope.

7. These Requests for Admission are continuing; You have a duty to supplement, amend, or correct any and all prior answers or responses as necessary.

8. The Committees and Government Parties reserve their rights to serve supplemental Requests for Admission.

REQUESTS FOR ADMISSION

1. Admit that You reviewed the ERS Enabling Act before You purchased any ERS bonds.

2. Admit that You are aware of no other authority, other than the ERS Enabling Act, that permits ERS to engage in debt financing.

3. Admit that You were aware that ERS had never issued any bonds before the 2008 ERS Bond Issuance.

4. Admit that You are not aware of any loans from the government of Puerto Rico or the United States that were made as part of the 2008 ERS Bond Issuance.

5. Admit that You are not aware of any form of borrowing by ERS from the government of Puerto Rico or the United States government as part of the 2008 ERS Bond Issuance.

6. Admit that You are not aware of any loans from any financial institution that were made as part of the 2008 ERS Bond Issuance.

7. Admit that ERS issued bonds in 2008 to the public through the use of underwriters.

8. Admit that members of the public purchased ERS Bonds in 2008.

9. Admit that the original owner of record for each ERS Bond has never transferred record ownership of any ERS Bond to any party.

10. Admit that: (i) no ERS bondholder provided the Fiscal Agent notice of a default in the payment of principal or interest on the ERS Bonds; (ii) owners of at least 25% in outstanding principal amount of the ERS Bonds did not request the Fiscal Agent to exercise its powers under § 1102(1) of the ERS Bond Resolution; and (iii) the Fiscal Agent did not decline any request of owners of at least 25% in outstanding principal amount of the ERS Bonds to exercise its powers under § 1102(1).

Dated: November 1, 2019

By: /s/ Luc A. Despins

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³ As it relates to the Creditors' Committee's omnibus claims objection at Docket No. 5580 and Adversary Proceeding No. 19-366.

⁴ As it relates to the Creditors' Committee omnibus claims objections at Docket No. 5580 and 5586 and Adversary Proceeding Nos. 19-356, 19-357, 19-358, 19-359, 19-361, 19-366, and 19-367.

By: /s/ John Arrastia

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